FG&D

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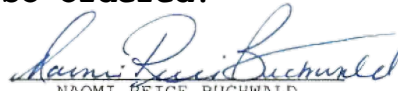
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August 20, 2024

> Application granted. Mr. Figueroa shall
> submit any requested travel information
> to the Pre-trial Services Officer.
> **So ordered.**
>
> *[signature]*
> NAOMI REICE BUCHWALD
> UNITED STATES DISTRICT JUDGE
> Dated: August 23, 2024
>   New York, New York

Via ECF
Honorable Naomi Reice Buchwald
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Jesus Figueroa*
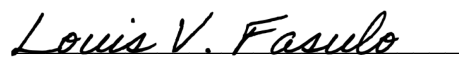**Case No.: 22Cr.253 (NRB)**

Dear Judge Buchwald,

I was assigned to represent Jesus Figueroa in the above referenced. For the reasons stated herein, I respectfully request a temporary bail modification so that Mr. Figueroa may travel to North Carolina to visit his son, who is in the Military and stationed there.

Mr. Figueroa is currently out on bail and restricted to travel to the District of New Jersey, and the Southern and Eastern Districts of New York. He would like to travel to North Carolina to visit his son, a Private first class stationed at Camp Lejeune. If approved, Mr. Figueroa and his family would travel to North Carolina on August 31, 2024, stay at an Air B&B off of the base, and return on September 3,2024. Additionally, he would: (1) fly to/from North Carolina from New York City, LaGuardia Airport, (2) be available via cellphone, and (3) provide a complete itinerary to Pre-Trial Services prior to his trip. As a result, we ask for the above referenced bail modification.

The Government has been notified of this request and consents to this application. Mr. Figueroa's Pre- Trial officer, Mr. Brian Sanchez, has no objection to the request, provided Mr. Figueroa submits a full itinerary to their office prior to his trip to North Carolina.

I thank the Court for its consideration.

Respectfully submitted,

Louis V. Fasulo
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Page 1 of 2

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